

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE ISOLAGEN, INC. SECURITIES AND DERIVATIVE
LITIGATION

MDL No. 2:06-md-01741

This Document Relates To: Civil Action No. 05-cv-04983-RB
and Consolidated Class Actions

**LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION OF
SETTLEMENT PROCEEDS AND LEAD COUNSEL'S MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that upon the (i) Joint Declaration of Steven B. Singer and Ira M. Press in Support of Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation and Lead Counsel's Application for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses and the Exhibits thereto; (ii) Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation of Settlement Proceeds; and (iii) Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses, being filed concurrently herewith; and all prior proceedings had herein, Lead Plaintiffs, Context Capital Management, LLC, Silverback Asset Management, LLC, Silverback Master Ltd., Silverback Life Sciences Master Fund, Ltd. and Michael McNulty, through their undersigned counsel, will move this Court before the Honorable Ronald L. Buckwalter on March 24, 2009 at 4:00 p.m. at the United States District Court for the Eastern District of Pennsylvania, 601 Market Street, Courtroom 14-A, Philadelphia, Pennsylvania 19106 for entry of a Final Judgment granting final approval to the Settlement and approving the Plan of Allocation of Settlement Proceeds; and Lead Counsel will move for entry of an Order Awarding Attorneys' Fees and Expenses.

A copy of the [Proposed] Final Judgment is attached hereto as Exhibit 1 and a copy of the [Proposed] Order Awarding Attorneys' Fees and Expenses is attached hereto as Exhibit 2.

Lead Counsel have conferred with counsel for Defendants and the motions are not contested.

Dated: New York, New York
March 18, 2009

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
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